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December 3, 2021

Via ECF

Hon. J. Paul Oetken
United States District Judge, Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Maria v. El Mambi Rest Corp., et al.*, Index No. 1:20-cv-03707-JPO

Dear Judge Oetken,

I represent all of the defendants in the above referenced matter. I write on behalf of the defendants, with the consent of the plaintiff's counsel to respectfully request an extension of the discovery deadline.

On July 20, 2021, the Court issued a Civil Case Management Plan and Scheduling Order that included, among other things, a discovery cutoff of November 24, 2021. [Dkt. No. 43] However, as the Court is aware, on November 06, 2021, plaintiff's counsel filed a Motion to Withdraw as Counsel. [Dkt. No. 45]

Prior to that motion and in its aftermath, the parties were unsure as to what would happen or how to proceed. Thus, we waited until that issue was sorted out before attempting to complete discovery. Since that issue is now resolved, we respectfully request an extension of the discovery deadline to February 18, 2022, and an adjustment of all related deadlines accordingly.

No similar request has been previously made.

We thank the Court for its time and attention to this matter.

Very truly yours,

Martin E. Restituyo



cc. All parties (Via ECF)